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July 31, 2017

VIA FEDERAL EXPRESS

Internal Revenue Service Annex
c/o GSA Property Management Office
Attn: Records Custodian
2385 Chamblee Tucker Road
Chamblee, GA 30341

Re: (b) (6) v Omni Elevator Co., Inc. et al.
Fulton County Superior Court Civil Action No. 2016-CV280984
Date of Loss: 10/8/14
Location of Loss: IRS Annex
Building No. GA0010AE
2385 Chamblee Tucker Road, Chamblee, GA 30341
Our Ref: 2927-54668

Dear Sir/Madam:

Please be advised that our firm represents the Defendant, Omni Elevator Co., Inc., in a lawsuit filed in the Superior Court of Fulton County. In order to effectively represent our client, it is necessary to examine certain records regarding the plaintiff, (b) (6) alleged incident which occurred on (b) (4) inside the IRS Annex, Building No. GA0010AE, located at 2385 Chamblee Tucker Road, Chamblee, Georgia 30341.

Enclosed is a Request for Production of Documents necessitated by litigation involving the above-referenced plaintiff. These requests are authorized by O.C.G.A. § 9-11-34 which permits a party to secure relevant documents from persons, firms or corporations who are not parties to the lawsuit.

The documents that are being requested are specifically enumerated on the Request for Production of Documents. Unless otherwise stated thereon, the entire file, including billing, is to be produced without any omissions whatsoever, which relate the plaintiff, (b) (6) alleged incident which occurred on (b) (4) inside the IRS Annex, Building No. GA0010AE, located at 2385 Chamblee Tucker Road, Chamblee, Georgia 30341.

We will promptly pay your reasonable copying costs upon receipt of the documents, including the enclosed fully-executed Declaration and your statement. If you prefer payment in advance, please notify me of the amount of the copying costs and we will send you our firm's check. Please do not prepare any special reports, summaries or transcriptions, other than those which are already contained in the records.

Should you have any questions, please feel free to call me at your convenience. If not, we look forward to receiving your response within the time required by law.

Sincerely,

(b) (6)

PAMELA MESSENGER

Paralegal to Stephen J. Cohen

Enclosures

cc: Reginald A. Greene, Esq. and Jenaye M. Lawrence, Esq.
Kevin A. Doyle, Esq. and Yamisi James, Esq.
Adrian Britt, Esq.

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

EDWARD COOK,

Plaintiff,

v.

SCHINDLER ELEVATOR
CORPORATION, BROOKS RANGE
CONTRACT SERVICES, and OMNI
ELEVATOR CO., INC.

Defendants.

Civil Action File No.
2016CV280984

REQUEST FOR PRODUCTION OF DOCUMENTS TO A NON-PARTY

TO: Internal Revenue Service Annex
c/o GSA Property Management Office
Attn: Records Custodian
2385 Chamblee Tucker Road
Chamblee, GA 30341

Within thirty (30) days after service hereof you are hereby requested, pursuant to O.C.G.A. § 9-11-34-(c), to produce for inspection and copying at the office of Carlock, Copeland & Stair, LLP, 191 Peachtree Street, N.E., Suite 3600, Atlanta, Georgia 30303, the following described documents:

- (a) Any and all incident reports, memorandum, photographs, witness statements, or documents of any kind concerning Edward Cook's alleged incident on **October 8, 2014** at the **IRS Annex, Building No. GA0010AE, located at 2385 Chamblee Tucker Road, Chamblee, GA 30341.**

Pursuant to O.C.G.A. § 24-8-803(6) and 24-9-902(11), all parties are hereby notified of the undersigned's intention to offer records produced in response to this Request into evidence at the trial of this case. Such records and declaration shall be made available to all parties for inspection upon request.

In lieu of producing for inspection and copying, you may send photocopies of such documents to the address stated below, and the reasonable cost of reproduction will be paid by the Defendant.

This 31st day of July, 2017.

191 Peachtree Street, N.E.
Suite 3600
Atlanta, Georgia 30303
Phone: (404) 522-8220
Fax: (404) 523-2345
glovell@carlockcopeland.com
sjcohen@carlockcopeland.com

CARLOCK, COPELAND & STAIR, LLP

(b) (6)

By:

D. GARY LOVELL, JR.
Georgia Bar No. 459389
STEPHEN J. COHEN
Georgia Bar No. 556599

*Attorneys for Defendant, Omni
Elevator, Co., Inc.*

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing pleading upon all parties to this matter by depositing a true copy of same in the U. S. Mail, proper postage prepaid, addressed to counsel of record as follows:

Reginald A. Greene, Esq.
Greene Legal Group, LLC
One Georgia Center, Suite 605
600 West Peachtree Street, NW
Atlanta, GA 30308

Jenaye M. Lawrence, Esq.
P.O. Box 764
Fairburn, GA 30213

Kevin A. Doyle, Esq.
Yamisi James, Esq.
Lockey, Mobley and Doyle, LLP
8425 Dunwoody Place
Atlanta, GA 30350

Adrian Britt, Esq.
Dodson & Associates
Caller Service No. 1808
1000 Winward Concourse, Suite 210
Alpharetta, GA 30005

This 31st day of July, 2017.

CARLOCK, COPELAND & STAIR, LLP

(b) (6)

By:

STEPHEN J. COHEN
Georgia Bar No. 556599

*Attorneys for Defendant, Omni
Elevator, Co., Inc.*

191 Peachtree Street, N.E.
Suite 3600
Atlanta, Georgia 30303
Phone: (404) 522-8220
Fax: (404) 523-2345
sjcohen@carlockcopeland.com

DECLARATION OF AUTHENTICITY
PURSUANT TO O.C.G.A. § 24-9-902(11)

THE UNDERSIGNED, _____, declares that he/she is a custodian of records and is a person responsible for the keeping of records for GSA PROPERTY MANAGEMENT, and the within and attached records are true and accurate reproductions and copies of the records which were kept in the offices of GSA PROPERTY MANAGEMENT, and that said records were kept as reasonably necessary. Pursuant to O.C.G.A. § 24-9-902(11), THE UNDERSIGNED declares that the within and attached records:

- (A) Were made at or near the time of the occurrence of the matter set forth by, or from information transmitted by, a person with knowledge of such matters;
- (B) Were kept in the course of the regularly conducted activity; and
- (C) Were made by the regularly conducted activity as a regular practice.

THIS DECLARATION is given in lieu of the personal appearance of THE UNDERSIGNED, and in connection with a case or proceeding entitled Edward Cook v. Omni Elevator, Co., Inc., et al., Civil Action File No. 2016CV280984, in the Superior Court of Fulton County, State of Georgia. THE UNDERSIGNED further declares that said records with this attached Declaration were delivered to Pamela Messenger, Carlock Copeland & Stair, LLP, 191 Peachtree Street, Suite 3600, Atlanta, GA 30303, Paralegal to Stephen J. Cohen, attorney for the Defendant in the above-styled case who sought production, pursuant to O.C.G.A. § 9-11-34.

Records Custodian for: **GSA Property
Management**

Sworn to and subscribed
before me this ____ day
of _____, 2017.

Notary Public
My Commission Expires:

(AFFIX NOTARIAL SEAL)